## Case 16-24153-CMB Doc 43 Filed 02/24/17 Entered 02/24/17 21:58:38 Desc Main Document Page 1 of 2 IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:			
	Leonard M. Aftanas and	)	Bankruptcy No. 16-24153-CMB
	Mary J. Aftanas,	)	Chapter 13
		)	
	Debtors.	)	
		)	
		)	
	First National Bank of	)	
	Pennsylvania,	)	
		)	
	Movant,	)	Hearing Date and Time:
		)	March 22, 2017 at 10:00 a.m.
	v.	)	
		)	
	Leonard M. Aftanas and	)	
	Mary J. Aftanas,	)	
		)	
		)	
	Respondent(s).	)	

## RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW come Respondent(s) Leonard M. Aftanas and Mary J. Aftanas by and through their attorney Brian C. Thompson, Esquire, Thompson Law Group, P.C., and hereby respond to the Motion for Relief from the Automatic Stay as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted in part. The vehicle at issue is often, but not always located at Debtors' residence as it is necessary for Debtor use for work and life activities critical to this reorganization. Debtor is currently without sufficient information to adequately respond to this allegation.
  - 6. Denied. Conclusion of law to which no response is required.

Case 16-24153-CMB Doc 43 Filed 02/24/17 Entered 02/24/17 21:58:38 Desc Main

- Document Page 2 of 2
  7. Denied. Debtor is currently without sufficient information to adequately respond to this allegation. Strict proof demanded.
- 8. Denied. Debtor is currently without sufficient information to adequately respond to this allegation. Strict proof demanded.
  - 9. Denied in part.
    - A. Denied. Debtor is currently without sufficient information to adequately respond to this allegation. Strict proof demanded.
    - B. Denied. The vehicle at issue is vital to Debtors' reorganization.
    - C. Denied. Debtor is currently without sufficient information to adequately respond to this allegation. Strict proof demanded.
    - D. Admitted
    - E. Denied. A payment in the full plan payment amount of \$1,332.00 was received by the Chapter 13 Trustee on February 6, 2017, Exhibit "A", attached hereto.
    - F. Admitted.
    - G. Admitted in part. The Debtors did appear at the meeting of creditors held on May 11, 2016 in their prior case.
- 10. Denied. Debtor is currently without sufficient information to adequately respond to this allegation. Strict proof demanded.

WHEREFORE, Respondents, respectfully request that this court deny Movant's Motion for Relief from the Automatic Stay.

Executed on: February 24, 2017

s/Brian C. Thompson
Brian C. Thompson, Esquire
Attorney for Debtor
PA-91197
THOMPSON LAW GROUP, P.C.
125 Warrendale-Bayne Road, Suite 200
Warrendale, Pennsylvania 15086
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com